



December 17, 2021

SENT VIA EMAIL TO N. SCHULZ

Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency
Region 5
Attn: Natalie Schulz
Email: schulz.natalie@epa.gov

Re: Renergy's Response to US EPA's Request to Provide Information Pursuant to the Clean Air Act dated 10/4/2021

Dear Mr. Schulte:

Renergy Inc. ("Renergy") hereby submits its response to US EPA information request brought pursuant to its authority under Section 114(a) of the Clean Air Act ("CAA"), 42 U.S.C. § 7414(a).

For over a month, Renergy, a small family owned business with few employees, has spent significant time and effort gathering and reviewing the requested information.

Renergy's narrative responses to the twenty six (26) requests are as follows:

1. Provide a description of the relationship between Renergy and Quasar Energy Group.

Renergy's Response: Quasar Energy Group was hired by Renergy (then Ringler Energy) as the engineering, procurement, and construction (EPC) contractor to build both the Emerald BioEnergy and Dovetail Energy facilities. The Emerald facility was constructed in 2013 and the Dovetail facility was constructed in 2014 under those EPC contracts. At the time of construction, Quasar Energy Group owned 20% of each facility, with Renergy owning the 80% of each facility. Quasar maintained an ownership position in each facility until Renergy bought Quasar's entire interest in both on April 1, 2017, making Renergy the sole member of both Emerald BioEnergy and Dovetail Energy. Since that time and at the present there is effectively no relationship between Quasar and Renergy.

2. Provide all air permits in effect for Dovetail, Emerald, and Steamtown at any point during the past five years.

Renergy's Response: All required permits were uploaded to the US EPA data room.

3. Provide a description of the operations at the Steamtown facility, including a list of all air emission units at the facility.

Renergy's Response: There are no air emission units at the facility and there is no air permit required. Steamtown operates under Ohio EPA authority as an anaerobic treatment lagoon system. The facility primarily receives inbound organic material that has been digested at anaerobic digestion systems including Dovetail Energy and Emerald BioEnergy. The material is received into a primary processing pond where anaerobic activity occurs and breaks down organic material. The organic materials break down and solids are accumulated at a very slow rate in the bottom of the processing pond. The top of the processing pond is water that flows into a secondary pond as additional material is received into the processing pond (the processing pond stays at a static volume). Water from the secondary pond is beneficially reused as irrigation water (primarily applied via automated center pivot irrigation systems) on surrounding farm fields. This top layer of water also serves as an odor barrier.

4. For each day beginning on January 1, 2016, until the date of your receipt of this request, list the periods of time (including the date, start time, and end time) that the anaerobic digesters at both Dovetail and Emerald were operating, in Microsoft Excel or other compatible format. In the same document, delineate when the digester was venting to the engine and when the digester was venting to the flare.

Renergy's Response: Data is available from July 2018 to current. Both anaerobic digestion systems (ADS) have operated continuously from commissioning to current. See the corresponding folder uploaded to the US EPA data room.

5. Provide a list of all air enforcement actions related to Dovetail, Emerald, and Steamtown taken by any state or local regulatory agency, from January 1, 2016, to the present. Include copies of any air related administrative or judicial complaints; any notices of violation or notices of non-compliance; any documents resolving any alleged violations, such as consent decrees or consent orders; and any orders, such as administrative orders.

Renergy's Response:

- i. Dovetail: There have been no air enforcement actions taken by any state or local regulatory agency from January 1, 2016 to the present.
- ii. Emerald: There have been no air enforcement actions taken by any state or local regulatory agency from January 1, 2016 to the present.
- iii. Steamtown: There have been no air enforcement actions taken by any state or local regulatory agency from January 1, 2016 to the present.

6. Provide a description of Dovetail's, Emerald's, and Steamtown's protocols when it receives a community complaint, or a certain number of community complaints.

Renergy's Response: Very few community complaints are sent to Renergy in connection with the Dovetail, Emerald, or Steamtown facilities. When a complaint is received, an internal review of the complaint is immediately undertaken. Contact is attempted with the complainant for information gathering purposes. If there is validity to the complaint, solutions are evaluated, and action is taken to correct the issues. In reality, complaints regarding Dovetail, Emerald, and / or Steamtown, are received, to Renergy's knowledge, almost exclusively through Ohio EPA or other government agencies.

7. Provide a list of which, if any, state or federal air regulations apply to each sludge lagoon at Dovetail, Emerald, and Steamtown. Additionally, provide an explanation of company policy for controlling emissions or odors from the lagoons.

Renergy's Response:

i. Dovetail: To our knowledge, no state or federal air regulations apply to sludge lagoons at this site. In a recent discussion with Heather Kawecky at the Regional Air Pollution Control Agency (RAPCA), she indicated the sludge lagoon has been considered "de minimis" by the agency. The company policy for controlling emissions or odors from the lagoons is to follow all regulatory requirements related to the facility itself.

ii. Emerald: To our knowledge, no state or federal air regulations apply to sludge lagoons at this site. Renergy's policy for controlling emissions or odors from the lagoons is to follow all regulatory requirements related to the facility itself.

iii. Steamtown: To our knowledge, no state or federal air regulations apply to sludge lagoons at this site. Renergy's policy for controlling emissions or odors from the lagoons is to follow all regulatory requirements related to the facility itself.

8. Provide a list of which, if any, state or federal air regulations apply to each tank at Dovetail, Emerald, and Steamtown including, but not limited to, storage tanks and holding tanks. Additionally, provide an explanation of company policy for controlling emissions or odors from the tanks.

Renergy's Response:

i. Dovetail: P001 (Digester) is the only tank at Dovetail regulated by an air permit issued by RAPCA / OEPA. The permit is included as an attachment in Section 2 of this information request. Renergy's policy for controlling emissions or odors from any existing tanks is to follow all regulatory requirements related to the facility itself.

ii. Emerald: To our knowledge, no state or federal air regulations apply to tanks at this site. Renergy's policy for controlling emissions or odors from any existing tanks is to follow all regulatory requirements related to the facility itself.

iii. Steamtown: To our knowledge, no state or federal air regulations apply to tanks at this site. Renergy's policy for controlling emissions or odors from any existing tanks is to follow all regulatory requirements related to the facility itself.

Items 9 through 18 are regarding emission units B001 (CAT 3516) at Dovetail and B003 (Engine #1) at Emerald:

9. Provide the operations logs required by Dovetail Permit P0127783 C.1.d)(1), Emerald Permit P0125003 C.1.d)(1), or comparable conditions contained in any preceding air permits for the past three years.

Renergy's Response: See the corresponding folder uploaded to the US EPA data room.

10. Provide the records of fuel burned other than natural gas and digester gas required by Dovetail Permit P0127783 C.1.d)(2), Emerald Permit P0125003 C.1.d)(2), or comparable conditions in any preceding air permits for the past three years.

Renergy's Response: Neither Dovetail unit B001 nor Emerald unit B003 are capable of burning fuel other than natural gas and digester gas. No fuel has been burned in either unit other than digester gas. Neither site has natural gas available on site as an alternative.

11. Provide the monthly records of the natural gas and digester gas fuel usage in MMSCF required by Dovetail Permit P0127783 C.1.d)(3), Emerald Permit P0125003 C.1.d)(3), or comparable conditions in any preceding air permits for the past three years.

Renergy's Response: See the corresponding folder uploaded to the US EPA data room.

12. Provide the following information with regard to Dovetail Permit P0127783 C.1.d)(6), Emerald Permit P0125003 C.1.d)(5), or comparable conditions in any preceding air permits for the past three years:

- a. Identify the Option you have elected for monitoring and recording the hydrogen sulfide concentrations;***
 - i. If Option 1, provide the make and model of the gas detector tube or portable gas monitoring meter used and the associated manufacturer's instructions; or,***
 - ii. If Option 2, provide the make and model of the continuous digester gas monitoring system and the associated manufacturer's operating manual.***
- b. Provide the records of hydrogen sulfide concentration exceedances and the records of corrective actions taken***

Renergy's Response: At the Emerald site, a continuous digester gas monitoring system is in place. The continuous digester gas monitoring system is a Sewerin Multitec 545. Relevant documents were uploaded to the US EPA data room.

At the Dovetail site, a portable digester gas monitoring system is utilized. The portable digester gas monitoring system is a Landtec Biogas 5000.

13. Provide the monthly records of the heat content of the digester gas in Btu/scf required by Dovetail Permit P0127783 C.1.d)(7), Emerald Permit P0125003 C.1.d)(4), or comparable conditions in any preceding air permits for the past three years.

Renergy's Response: See the corresponding folder uploaded to the US EPA data room.

14. Provide the annual permit evaluation report required by Dovetail Permit P0127783 C.1.e)(2), Emerald Permit P0125003 C.1.e)(2), or comparable conditions in any preceding air permits for the past three years.

Renergy's Response: See the corresponding folder uploaded to the US EPA data room.

15. Provide all reports submitted or records maintained by Renergy as required by NSPS Subpart JJJJ at 40 C.F.R. § 60.4245(a), Dovetail Permit P0127783 C.1.d)(4), Emerald Permit P0125003 C.1.d)(6), or comparable conditions in any preceding air permits for the past three years.

Renergy's Response: See the corresponding folder uploaded to the US EPA data room.

16. Provide the results of the most recent performance tests required by Dovetail Permit P0127783 C.1.f)(2), Emerald Permit P0125003 C.1.f)(2), or comparable conditions in any preceding air permits. Provide an explanation of how the most recent performance tests meet the requirements in 40 C.F.R. § 60.8 and the conditions that are specified by Table 2 of NSPS Subpart JJJJ.

Renergy's Response: Renergy determined that the most recent tests met the requirements based on RAPCA / OEPA feedback that all requirements and conditions had been met. See also the corresponding folder uploaded to the US EPA data room.

17. Provide a list of all the test methods and equations the Dovetail and Emerald facilities use to demonstrate compliance with the allowable mass emission rates and limitations in the Dovetail Permit P0127783 C.1.f)(1)a.-f. and the Emerald Permit P0125003 C.1.f)(1)a.-d.

Renergy's Response: See the corresponding folder uploaded to the US EPA data room.

18. Provide all reports submitted or records maintained by Renergy as required by NESHAP Subpart ZZZZ at 40 C.F.R. § 63.6650 for the past three years.

Renergy's Response: See the corresponding folder uploaded to the US EPA data room.

Items 19 through 26 are regarding emission units P001 (Digester = Digester with Flare) at Dovetail and P001 (P001 = Flare) at Emerald:

19. State the following:

- a. Flare manufacturer and model:* Both Emerald & Dovetail -- Quasar Energy Group Model # Unknown
- b. Flare diameter:* Both Emerald & Dovetail -- 43.5"
- c. Flare installation date:* Emerald 2013, Dovetail 2015
- d. Whether the flare is unassisted, steam-assisted, or air-assisted:* Both Emerald & Dovetail -- unassisted

20. For each day beginning on January 1, 2016, until the date of your receipt of this request, list the periods of time (date, start time, and end time) that Digester Gas was routed to the flare at the facility (i.e., "venting periods"), in Microsoft Excel or other compatible format.

Renergy's Response: See the corresponding folder uploaded to the US EPA data room.

21. For each venting period listed in response to item 20 above, provide the average mass flow rate of the Vent Gas, in lb/hr, that was vented to each facility flare in Microsoft Excel or other compatible format. The averaging time shall be no more than one hour. If the mass flow rate is not measured, you shall use the best means available to estimate it. Provide a narrative explanation and example calculations, if appropriate, describing how you arrived at your response.

Renergy's Response: The mass flow rate is not measured by Renergy.

22. Provide the records for the volume of digester gas flared in standard cubic feet per year, and the annual heat input to the flare in million Btu, required by Dovetail Permit P0124072 C.2.d)(4), Emerald Permit P0125003 C.2.d)(4), or comparable provisions in any preceding air permits, for the shorter of the past five years or from the date operation of the flare commenced through the date of your receipt of this request.

Renergy's Response: See the corresponding folder uploaded to the US EPA data room.

23. For each venting period listed in response to item 20 above, provide the average net heating value, in Btu/scf, of the Vent Gas combusted at each flare in Microsoft Excel or other compatible format. The averaging time shall not be greater than one hour. If the heating value is not measured, you shall use the best means available to measure it for two weeks, commencing five days after receipt of this letter. Provide a narrative explanation and example calculations, if appropriate, describing how you arrived at your response.

Renergy's Response: See the corresponding folder uploaded to the US EPA data room.

24. Provide the monthly records of the heat content of the digester gas, in Btu/scf, required by Dovetail Permit P0124072 C.2.d)(2), Emerald Permit P0125003 C.2.d)(2), or comparable provisions in any preceding air permits, for the shorter of the past five years or from the date operation of the flare commenced through the date of your receipt of this request.

Renergy's Response: See the corresponding folder uploaded to the US EPA data room.

25. Provide the following information with regard to Dovetail Permit P0124072 C.2.d)(1), Emerald Permit P0125003 C.2.d)(1), or comparable provisions in any preceding air permits:

a. Identify the Option you have elected for monitoring and recording the hydrogen sulfide concentrations;

i. If Option 1, provide the make and model of the gas detector tube or portable gas monitoring meter used and the associated manufacturer's instructions; or,

ii. If Option 2, provide the make and model of the continuous digester gas monitoring system and the associated manufacturer's operating manual.

b. Provide the weekly or continuous hydrogen sulfide concentrations at the flare emissions units, in ppm, for the time period of January 1, 2016 until the date of your receipt of this request.

c. Provide the records of hydrogen sulfide concentration exceedances and the records of corrective actions taken for the past three years.

Renergy's Response:

i. Dovetail: A portable digester gas monitoring system is utilized. The portable digester gas monitoring system is a Landtec Biogas 5000.

ii. Emerald: A continuous digester gas monitoring system is in place. The continuous digester gas monitoring system is a Sewerin Multitec 545. See the corresponding folder uploaded to the US EPA data room.

26. Provide copies of the last five years of annual permit evaluation reports (PER) required by Dovetail Permit P0124072 C.2.e)(2), Emerald Permit P0125003 C.2.e)(2), or comparable provisions in any preceding air permits.

Renergy's Response: See the corresponding folder uploaded to the US EPA data room.

Finally, Renergy is committed to working cooperatively with U.S. EPA to adequately respond to this information request. Please do not hesitate to contact Renergy with any questions, comments, or concerns. We will respond as promptly and completely as possible. Thank you.

W. Michael Oberfield

W. Michael Oberfield

CFO, Renergy, Inc.

December 17, 2021

CERTIFICATION

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1519.

W. Michael Oberfield

A handwritten signature in black ink that reads "W. Michael Oberfield". The signature is written in a cursive style with a large, stylized 'W' and 'O'.

CFO, Renergy, Inc.
December 17, 2021